

1 WRIGHT, FINLAY & ZAK, LLP  
2 Darren T. Brenner, Esq.  
3 Nevada Bar No. 8386  
4 Lindsay D. Dragon, Esq.  
5 Nevada Bar No. 13474  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
8 (702) 637-2345; Fax: (702) 946-1345  
9 [ldragon@wrightlegal.net](mailto:ldragon@wrightlegal.net)

10 *Attorneys for Plaintiff, U.S. Bank National Association As Legal Title Trustee For Truman 2016*  
11 *SC6 Title Trust*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 U.S. BANK NATIONAL ASSOCIATION AS  
15 LEGAL TITLE TRUSTEE FOR TRUMAN  
16 2016 SC6 TITLE TRUST,

17 Plaintiff,

18 vs.

19 STEWART INFORMATION SERVICES  
20 CORP.; STEWART TITLE GUARANTY  
21 COMPANY; DOE INDIVIDUALS I through  
22 X; and ROE CORPORATIONS XI through  
23 XX, inclusive,

24 Defendants.

Case No.: 2:21-cv-01875-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO  
RESPOND TO STEWART  
INFORMATION SERVICES CORP.'S  
MOTION TO DISMISS [ECF No. 4]**

**[Second Request]**

25 COMES NOW Plaintiff, U.S. Bank National Association as Legal Title Trustee For  
26 Truman 2016 SC6 Title Trust ("U.S. Bank") and Defendant Stewart Information Services Corp.  
27 ("SISC"), by and through their counsel of record, hereby stipulate and agree as follows:

- 28 1. On September 14, 2021, U.S. Bank filed its Complaint in Eighth Judicial District Court,  
Case No. A-21-841029-C [ECF No. 1-1];
2. On October 11, 2021, Defendants filed a Petition for Removal to this Court [ECF No. 1];
3. On October 12, 2021, SISC filed its Motion to Dismiss for lack of personal jurisdiction  
[ECF No. 4];
4. U.S. Bank's deadline to respond to SISC's Motion to Dismiss is currently November 3,  
2021 [ECF No. 8];

- 1        5. U.S. Bank is requesting a brief extension until Wednesday, November 10, 2021, to file its  
2        response to the Motion to Dismiss;
- 3        6. The Parties previously discussed a stipulation to stay this case in its entirety, but on  
4        November 1, 2021, the Parties agreed to a partial stay pending SISC's Motion to Dismiss  
5        and U.S. Bank's Motion for Remand. [ECF No. 10]. Because briefing on SISC's Motion  
6        to Dismiss will proceed, U.S. Bank is requesting additional time to respond to the points  
7        and authorities in SISC's Motion;
- 8        7. Counsel for SISC does not oppose the requested extension;
- 9        8. This is the second request for an extension which is made in good faith and not for  
10       purposes of delay.

11       **IT IS SO STIPULATED.**

12       DATED this 3<sup>rd</sup> day of November, 2021.  
13       WRIGHT, FINLAY & ZAK, LLP


14       /s/ Lindsay D. Dragon  
15       Lindsay D. Dragon, Esq.  
16       Nevada Bar No. 13474  
17       7785 W. Sahara Ave., Suite 200  
18       Las Vegas, NV 89117  
19       *Attorneys for Plaintiff, U.S. Bank National  
20       Association As Legal Title Trustee For  
21       Truman 2016 SC6 Title Trust*

12       DATED this 3<sup>rd</sup> day of November, 2021.  
13       MAURICE WOOD

14       /s/ Brittany Wood  
15       Brittany Wood, Esq.  
16       Nevada Bar No. 7562  
17       8250 West Charleston Blvd., Suite 100  
18       Las Vegas, Nevada 89117  
19       *Attorney for Defendants Stewart  
20       Information Services Corp. and Stewart  
21       Title Guaranty Company*

20       **IT IS SO ORDERED.**

21       DATED November 3, 2021.

22         
23       \_\_\_\_\_  
24       UNITED STATES DISTRICT JUDGE